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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
LETTER BRIEF RE OUTSTANDING
DISCOVERY ITEMS (DKT. 2419)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness,
4 I could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Letter Brief Re
6 Outstanding Discovery Items (Dkt. 2419).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1 to Waymo's Letter Brief	Redacted portions in public refileing at Dkt. 2401-1
Exhibit 4 to Waymo's Letter Brief	Entire Document
Exhibit 5 to Waymo's Letter Brief	Red Boxes
Exhibit 6 to Waymo's Letter Brief	Red Boxes
Exhibit 8 to Waymo's Letter Brief	Red Boxes
Exhibit 11 to Waymo's Letter Brief	Red Boxes

18 3. I understand that Exhibit 1 to Waymo's Letter Brief is the same document as
19 Exhibit B to the Court's November 29, 2017 Order (Dkt. 2307-2), for which the Court has already
20 granted sealing with respect to the green-highlighted portions of that document. (Dkt. 2307 at 2.)
21 The Court's December 13, 2017 Order granted additional redactions to Exhibit A to the Boersch
22 Declaration (Dkt. 2382), which are also reflected in the public re-filing of Dkt. 2307-2. (Dkt.
23 2401-1.) Exhibit 1 to Waymo's Letter Brief contains information that implicates the safety,
24 privacy, and reputational interests of former and current Uber employees and vendors, as well as
25 various third party individuals and entities. Defendants support sealing of the redacted portions in
26 Dkt. 2307-2 and Dkt. 2401-1.

27 4. The entirety of Exhibit 4 contains highly confidential information regarding
28 internal communications among company employees relating to internal investigations. Similar

1 to the names sealed in Exhibit 1 in accordance with the Court's November 29, 2017 and
2 December 13, 2017 Orders, this exhibit contains information that could implicate the safety,
3 privacy, and reputational interests of former and current Uber employees. Defendants request
4 sealing of this document to protect these interests.

5 5. The red boxes in Exhibits 5 and 11 contain telephone numbers of Uber employees,
6 which include personal contact information. Uber requests that this contact information be kept
7 confidential in order to protect Uber employees from harm or harassment.

8 6. The red boxes in Exhibit 6 contain the email addresses and telephone numbers of
9 government employees. Uber requests that this contact information be kept confidential in order
10 to protect government employees from harm or harassment.

11 7. The red boxes on Exhibit 8 contain a list of current and former employee names
12 relating to certain in-house counsel communications. Uber requests this list be kept confidential
13 in order to protect the privacy of individuals currently or formerly at a company that is subject of
14 extensive media coverage, in order to protect them from harm or harassment. Uber's request is
15 narrowly tailored to names that have not been made public with respect to this subject matter.

16 8. Defendants' request to seal is narrowly tailored to the portions of exhibits to
17 Waymo's Letter Brief that merit sealing.

18 I declare under penalty of perjury that the foregoing is true and correct. Executed this
19 26th day of December, 2017 at Washington, District of Columbia.

20
21 /s/ Michelle Yang

Michelle Yang